



May 12, 2020

VIA ECF

United States District Court
Northern District of New York
Magistrate Judge Daniel J. Stewart
James T. Foley U.S. Courthouse
445 Broadway, Suite 509
Albany, NY 12207

**Re: United States v. Delaney
Case No. 1:19-MJ-843 (DJS)**

Dear Judge Stewart:

We represent Jacob Delaney in the above matter. Jacob remains under the supervision of pretrial services in the Eastern District of New York. We have two requests that pretrial services states that we need the Court's approval for.

First, although Jacob is currently released on home detention, we request permission for Jacob to be able to take walks around his neighborhood while accompanied by one of his parents. Jacob has lost his job and cannot attend in person therapy due to the public health emergency. With the weather improving, Jacob's mental health would greatly benefit from spring's fresh air. Jacob would be happy to consent to limiting his walks to a route or routes that are preapproved by pretrial services, should that be requested or required.

I have conferred with the Government regarding this first request, and the Government consents on the condition that permission is temporary; that Jacob be accompanied by his mother or father; and the walks be limited to two times per week for up to 30 minutes each time. The Government further requests that this temporary approval be removed once Jacob is able to resume employment and in-person treatment. The Government also noted that this activity is outside of the norm of Home Detention and the Government and Probation consent because this as a wellness activity due to lack of employment (his employer is closed due to COVID) and ongoing mental health concerns.

Second, Jacob still has furniture and other personal property in his former apartment in New Paltz, New York, where he was living at the time of his arrest. His

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1925-1939
SAMUEL E. ARONOWITZ
1925-1973
LEWIS A. ARONOWITZ
1951-1979

CORNELIUS D. MURRAY
STEPHEN R. COFFEY
JEFFREY J. SHERRIN
THOMAS J. DiNOVO
PAMELA A. NICHOLS
JEFFREY A. SIEGEL
DAVID R. ROSS
KURT E. BRATTEN
MICHAEL P. McDERMOTT
PETER A. PASTORE
KEVIN LAURILLIARD
KELLY J. MIKULLITZ
WILLIAM F. BERGLUND
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CRISTINA D. COMMISSO
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ROLAND M. CAVALIER

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MICHAEL Y. HAWRYLCHAK
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CONSULTING GROUP)

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Page 2

May 12, 2020

lease expires this summer and he would like permission to take a day trip with his father to retrieve his property and furniture from his apartment. Specifically, Jacob would like to travel with his father on June 16th. We would also request that the Court approve an alternative backup date for June 20th in the event an issue arises with the 16th. Jacob would propose that he check in with pretrial services before he leaves and upon his return and that he be under his father's supervision the entire time. The Government does not oppose this request.

I am happy to discuss the details of these requests with the Court if that would assist in anyway.

Thank you for your attention to this matter.

Respectfully yours,

O'CONNELL AND ARONOWITZ

By:

A handwritten signature in black ink, appearing to read 'S. Iseman', written over a horizontal line.

Scott W. Iseman, Esq.

So Ordered: _____

Hon. Daniel J. Stewart

cc: All parties via CM/ECF